

August 25, 2014

Tom Wheeler, Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: MB Docket No 14-57

Dear Chairman Wheeler:

On behalf of OCA – Asian Pacific American Advocates, a national membership-driven organization of community advocates dedicated to advancing the social, political, and economic well-being of Asian Pacific Americans (APAs), I write to support the merger of Comcast and Time Warner.

OCA represents one of the organizations that signed onto the APIA MOU associated with the NBCUniversal Comcast merger. We have worked with Comcast through its Joint Diversity Council (JDC) to both ensure that Comcast kept its promises and help them achieve a broader set of goals established in consultation with the members of the JDC. We report that all commitments agreed upon in the APIA MOU were met, and in some cases, exceeded the agreed upon time frames.

As one of the organizations on this council, one of our key priorities has always been expanding access to broadband Internet for underserved communities. Asian Pacific Americans include a broad range of socioeconomic statuses. According to a report by the National Coalition for Asian Pacific American Community Development (National CAPACD), almost 2 million APAs live at or below the poverty line in the United Statesⁱ. And though Southeast Asian and Pacific Islander Americans have some of the highest rates of poverty among all racial and ethnic groups in the United Statesⁱⁱ, Chinese and Indian Americans have the highest absolute number of individuals living in poverty at 449,356 and 246,399 respectivelyⁱⁱⁱ. Comcast's Internet Essentials program has been one of the primary vehicles for low-income families with children who receive free or reduced-price school lunches to access affordable broadband Internet, particularly in the APA communities.

Geographically, some of the areas with the largest concentration of poor Asian Americans (AA) are located in California and New York. While the largest concentrations of poor Native Hawaiian and Pacific Islanders (NHPI) are in Hawaii^{iv}. By allowing the merger of Comcast and Time Warner, the FCC would allow Comcast to expand a necessary program for low-income APA communities into California and Hawaii, areas in need of affordable broadband Internet. Additionally, we cannot foresee any negative effects to the community because of the merger, given that Comcast has fulfilled all mandates indicated in the MOU signed during the Comcast and NBCUniversal merger. As such, the proposed merger brings more opportunities for improved community service and access than any potential negative consequences.

As president of one of the oldest Asian Pacific American civil rights organizations, I have seen firsthand the importance internet access plays in the economic and academic success of low-income families. Access affects every facet of modern life, from supplementary educational information to online job

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DEDICATED TO ADVANCING THE SOCIAL, POLITICAL, AND ECONOMIC WELL-BEING OF ASIAN PACIFIC AMERICANS

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applications. The Comcast and Time Warner merger would give hundreds of thousands of APAs without a home broadband internet connection much needed access, and that is vital to their success in the 21st century.

Sincerely,



Sharon M. Wong
OCA National President

ⁱ National Coalition of Asian Pacific American Community Development (June 2013). *Spotlight: Asian American and Pacific Islander Poverty*. Retrieved from http://nationalcapacd.org/sites/default/files/u12/aapi_poverty_report-web_compressed.pdf.

ⁱⁱ Asian American Center for Advancing Justice (2011). A Community of Contrasts: *Asian Americans in the United States*. Retrieved from http://www.advancingjustice.org/sites/default/files/Community_of_Contrast.pdf.

ⁱⁱⁱ National Coalition of Asian Pacific American Community Development (June 2013). *Spotlight: Asian American and Pacific Islander Poverty*. Retrieved from http://nationalcapacd.org/sites/default/files/u12/aapi_poverty_report-web_compressed.pdf.

^{iv} National Coalition of Asian Pacific American Community Development (June 2013). *Spotlight: Asian American and Pacific Islander Poverty*. Retrieved from http://nationalcapacd.org/sites/default/files/u12/aapi_poverty_report-web_compressed.pdf.